



***de maximis, inc.***

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-Via email-

December 17, 2021

Zolymar Luna Díaz, RPM  
United States Environmental Protection Agency (EPA), Region 2  
Caribbean Environmental Protection Division  
City View Plaza II Suite 7000  
Road PR-165 KM 1.2  
Guaynabo, PR 00968

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Office of Regional Counsel  
290 Broadway  
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Subject: PROTECO Site, Peñuelas, Puerto Rico, EPA Docket No. CERCLA-02-2020-2010  
Submission of Work Plan to Clear Vegetation for the Surveying and Installation of a New  
Barbed Wire Fence along the Proposed Eastern Boundary of the Site

Dear Ms. Luna:

I write on behalf of the PROTECO Landfill Generators Parties' Group (Group), pursuant to Paragraphs 34 and 116 of the Administrative Settlement Agreement and Order on Consent for Remedial Investigation/Feasibility Study ("RI/FS AOC") to request permission to clear and survey a pathway along the eastern boundary of the Site for the purpose of installing a new barbed wire fence.

The purpose of the new fence is to secure the eastern boundary by connecting the southern fence to the northern fence with a new three (3) strand barbed wire fence. The barbed wire strands will be secured to new steel "T-posts" which will be driven into the ground. Once the new fence is installed, the Site would be enclosed on all sides with barbed wire in the hope of preventing livestock from entering the Site.

This work plan is being submitted in support of the Site Clearing Plan (SCP) that EPA approved on October 4, 2021. However, in order to install a new fence along the eastern boundary, the work must be performed in an order that varies from the approved SCP and requires EPA approval before we can proceed. We discussed this process during a December 8, 2021 telephone conversation. The requested order of work required to install the new eastern boundary fence is as follows:

1. The new fence pathway must be mechanically cleared before, or possibly in conjunction with, surveying the new eastern Site boundary fence route. The surveyor will establish the new fence route through the placement of new stakes. The fence crew will install fenceposts along the surveyed route. The approximate route of the proposed eastern Site boundary fence line is shown in Figure 1 attached to this plan.
2. The new eastern Site boundary fence route would need to be mechanically cleared of vegetation before the installation of any storm water and/or erosion control best management practices (BMPs) can occur. If the BMPs were installed prior to fencing the Site, the livestock would have the potential to destroy the BMPs.
3. Install the new fence along the surveyed route. As mentioned above, the purpose of the new fence is to secure the eastern Site boundary by connecting the southern fence to the northern fence with a new barbed wire fence. We currently estimate that approximately 2,600 to 2,700 feet of new fence will be required to secure the eastern Site boundary.
4. As the fence is being installed, Geosyntec will contact EPA if any livestock are observed so that EPA can contact the livestock owner to ask him to remove the livestock from the Site. Once the new eastern Site boundary eastern fence is installed, the Group will contact EPA to inform you that the work is completed and to contact the livestock owner to remove his animals from the Site. The west access gate to the Site will remain open to allow the livestock owner to remove any remaining animals. Once EPA has informed the Group that the livestock have been removed, the Site access gate will be closed.
5. Once it has been confirmed that all livestock have been removed from the Site, the Group will authorize Geosyntec to install the BMPs in the manner and locations as described in the approved SCP.
6. The Site vegetation clearing will continue in accordance with the approved SCP once the BMPs have been installed.

Please note that the Group must coordinate with Ecosystems and Brosval on the location and routing of the new eastern Site boundary fence once we receive written confirmation that EPA has approved this work plan. The Group will inform EPA, via email, when the fence location and routing coordination efforts with Ecosystem and Brosval have been completed. At that time, the Group will provide EPA with an estimated schedule for performing the work described in this work plan.

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Please contact me if you have questions or need additional information. Thank you in advance for your consideration of this work plan.

Best Regards,



Daniel N. Gainer, PG  
Project Coordinator

cc: Mike Miller, *de maximis, inc.*  
Jaime Feliciano, Geosyntec, Project Technical Consultant





**Legend**

- Proposed Boundary Vertices
- Existing Fenced Boundary
- Approximate Location of Proposed East Boundary Fence

Notes:  
Proteco Controlled Area Boundary digitized from USEPA/Weston- HRS Evaluation Report (2019) and updated based on field observations.

Aerial Imagery Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community (11/28/2020)

N

0

150

Feet

**PROTECO Superfund Site**

**Approximate Project Boundary and Proposed Area to be Cleared**

Proteco Landfill Superfund Site

Peñuelas, Puerto Rico

Geosyntec

consultants

FR3703C

December 2021

Figure

1

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